

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**CHMURA ECONOMICS &  
ANALYTICS, LLC,**

**Plaintiff/Counterclaim  
Defendant,**

**v.**

**RICHARD LOMBARDO,**

**Defendant/Counterclaim  
Plaintiff.**

**Case No. 3:19-cv-813-REP**

**JOINT MOTION TO EXTEND SUMMARY JUDGMENT DEADLINE**

Plaintiff Chmura Economics & Analytics, LLC (“Chmura” or “Plaintiff”) and defendant Richard Lombardo (“Lombardo” or “Defendant” and, collectively with Chmura, the “Parties”), by their respective counsel, respectfully move this Court for a one-week extension of their summary judgment filing deadline until May 15, 2020. In support of this Motion, the Parties state as follows:

1. On January 31, 2020, the Court entered its Scheduling Order (ECF No. 22) requiring all motions for summary judgment to be filed no later than forty-five days before the scheduled Final Pretrial Conference. (ECF No. 22-1, at 2.)

2. On February 19, 2020, the Court entered its Initial Pretrial Order scheduling the trial to begin on July 6, 2020 and scheduling the Final Pretrial Conference for June 24, 2020. Accordingly, the Parties’ summary judgment motions currently are due on May 8, 2020.

3. The Parties participated in a mediation on April 22, 2020, but were unable to reach a settlement.

4. Since the mediation, the Parties have worked diligently to complete document production and to coordinate depositions. The Parties have conducted several depositions (including multiple corporate depositions pursuant to Fed. R. Civ. P. 30(b)(6)).

5. The Parties have also diligently been working to prepare summary judgment briefs; however, the Parties require a one-week extension to adequately prepare their respective motions and accompanying briefs.

6. The Parties file this Motion before the expiration of the original summary judgment deadline set forth in the Scheduling Order.

7. Counsel for the Parties have conferred and agree to request this extension jointly.

8. The Parties make this request in good faith and not for the purpose of delay.

9. The proposed extension will not delay or otherwise affect any subsequent deadlines in this case.

WHEREFORE, the Parties respectfully request that this Court enter an Order: (1) granting this Motion; (2) providing them with an extension of time until up to and including May 15, 2020 to file their respective motions for summary judgment and accompanying briefs; and (3) providing them with a corresponding one-week extension to file their respective response and reply briefs.

May 6, 2020

Respectfully submitted,

**CHMURA ECONOMICS & ANALYTICS, LLC**

By: \_\_\_\_\_/s/\_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of May, 2020 a copy of the foregoing was filed with the Court's CM/ECF system, which will send a notice of electronic filing (NEF) to all counsel of record.

/s/

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